

# EXHIBIT D

Declaration of Peter C. Salerno  
In Opposition to Plaintiffs' Motion to Compel  
Against Yassin Abdullah Kadi

03 MDL 1570

January 2018

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) ECF Case
-----------------------------------------------	-------------------------------

*This document relates to:*

*Ashton v. Al Qaeda Islamic Army, 02-CV-6977*

*Burnett v. Al Baraka Investment & Development Corp., 03-CV-5738*

*Continental Casualty Co. v. Al Qaeda Islamic Army, 04-CV-05970*

*Estate of O'Neill v. Al Baraka Investment & Development Corp., 04-CV-1923*

*Euro Brokers, Inc. v. Al Baraka Investment & Development Corp., 04-CV-07279*

*Federal Insurance Co. v. Al Qaida, 03-CV-6978*

**PLAINTIFFS' SECOND SET OF JURISDICTIONAL REQUESTS FOR PRODUCTION  
OF DOCUMENTS DIRECTED TO DEFENDANT YASSIN ABDULLAH KADI**

Plaintiffs in 03-MDL-1570 propound and serve on Yassin Abdullah Kadi (hereinafter "Defendant"), the following Jurisdictional Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The Instructions and Definitions set forth in the Plaintiffs First Set of Requests for Production of Documents are incorporated herein by reference, except the following definitions shall also apply.

1. The term "Mercy Relief International" shall refer to the Mercy Relief International and Mercy Relief International USA organization and any branch office, including but not limited to those having operated in Albania, Bosnia Hercegovina, Croatia, Ireland, Kenya, Pakistan, Saudi Arabia, Sudan, Switzerland and the United States, as well as any subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer or representative acting on the behalf of the Mercy Relief International.

2. The term “Dan Fodio” shall refer to the Dan Fodio Commercial and Contracting Company, Dan Fodio Foundation, Dan International Trading & Investment, Dan Shipping and any branch office, including but not limited to those having operated in Sudan and the United Arab Emirates, as well as any subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer or representative acting on the behalf of Dan Fodio.
3. The term “Guraba” shall refer to Guraba Trade Ltd, Guraba Tekstil, Guraba Publications and Guraba Islamic Site and any branch office, including but not limited to those having operated in Albania, Turkey, and Yemen as well as any subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer or representative acting on the behalf of Guraba.
4. The term “ARY Group” shall refer to and entity under the control of Abdel Razzak Yaqub, including ARY Gold, ARY Traders, ARY International Exchange, ARY Jewelers and any branch office, including but not limited to those having operated in the United Arab Emirates, Pakistan or Sudan as well as any subsidiary, affiliate, officer, director, trustee, employee, attorney, consultant, accountant, agent, alter ego, volunteer or representative acting on the behalf of ARY Group.

## REQUESTS

1. Please provide all documents governing, describing, detailing, or otherwise relating to the Muwafaq Foundation; Kadi; and any entity in which Kadi or Muwafaq held a beneficial interest that describes or relates to the relationship with the following individuals or entities.
  - Salim Ahmed Bin Mahfouz
  - Uthman Ahmed Haidar aka Abu Adil
  - Mohamed Abdullah Bushara, a Sudanese national
  - Saul K. Kabbani, a donor to Muwafaq
  - Al Iman University aka al Eman University
  - Adyat Trading and Investment
  - ARY Group
  - Mosaic Foundation or Ahmed Khattan
  - Yasin Ahmed Mohamed Ali, a Sudanese national
  - the Abu Bashir Group in Bosnia Herzegovina
  - the Abu Zubair Group aka Abu Zubayr Group in Bosnia Herzegovina
  - al Faysal Investment Bank Pakistan
  - Human Relief International
  - Human Appeal International
  - Qatar Charitable Society
  - Mull Resources, an entity registered in Switzerland and Panama
  - al Baraka Turkish Finance House
  - Saudi Abrar Co
  - Rabita Trust
  - Khalid Ballayth, and any entity in which he held a beneficial interest, including but not limited to Binjad Establishment and Sana Trading
  - Dan Fodio
  - Guraba
  - International Islamic Company of the Gulf
  - Adil Islamic Growth Fund
  - East Africa Grains, Ltd

2. Please provide all documents governing, describing, detailing, or otherwise relating to any financial transaction between the Muwafaq Foundation; and/or Kadi; and/or any entity in which Kadi or Muwafaq held a beneficial interest and the following individuals or entities.

- Dubai Islamic Bank
- Prince Mohamed al Faisal
- Dallah Real Estate
- Dar al Maal al Islami

3. Please provide all documents relating to all accounts associated with Kadi; Muwafaq; and/or any entity in which Kadi or Muwafaq held a beneficial interest and the following entities. The accounts should include but not be limited to the spreadsheet attached. See Yassin Kadi Related Bank Accounts in Second Document Requests.

- al Amin Company for Securities
- al Baraka Finance House Turkey
- al Faysal Investment Bank Ltd, Pakistan
- al Rajhi Bank
- al Shamal Islamic Bank
- al Tawfeeq Company for Investment Funds
- American Bank of Albania
- Arab Albanian Islamic Bank
- Bank of Oman, Peshawar
- Barclays Bank
- BH Banka
- Banca della Svizzera Italiana
- Chase Manhattan Bank aka JP Morgan Chase
- Citibank, Malaysia
- Citibank, NY
- Credit Suisse

- Dallah al Baraka
- Emirates Bank International, Pakistan
- Faisal Islamic Bank Bahrain aka Shamil Bank of Bahrain
- International Commercial Bank Malaysia
- Mashreq Bank, Pakistan
- Midland Bank, London
- National Bank of Commerce, Albania
- National Commercial Bank
- National Community Bank, West Patterson, NJ
- Prudential Bache Securities (Switzerland)
- Raifeissen Bank, Albania
- SAB Bank Sarajevo
- Saudi British Bank
- Saudi Dutch Bank

Respectfully Submitted,

Dated May 6, 2015

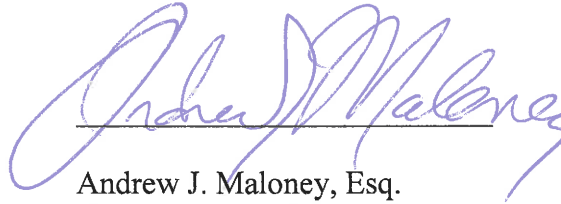
By: 

Andrew J. Maloney  
THE MDL 1570 PLAINTIFFS'  
EXECUTIVE COMMITTEE  
CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Second Set of Jurisdictional Requests for Production of Documents Directed to Defendant Yassin Abdullah Kadi was served via electronic mail and U.S. first-class mail, postage prepaid, this 6th day of May 2015, upon:

Amy Rothstein, Esq.  
Peter C. Salerno, Esq.  
Salerno & Rothstein  
221 Schultz Hill Rd.  
Pine Plains, NY, 12567

Alan R. Kabat, Esq.  
Bernabei & Wachtel, PLLC  
1775 T Street, N.W.  
Washington, D.C. 20009-7102



Andrew J. Maloney, Esq.  
Kreindler & Kreindler LLP  
750 Third Ave  
New York, NY, 10017